

**JUAN SUMULONG, IN HIS CAPACITY AS PRESIDENT OF
"PAGKAKAISA NG BAYAN" (POPULAR FRONT PARTY),
PETITIONER, VS. THE COMMISSION ON ELECTIONS, AND PEDRO
ABAD SANTOS, RESPONDENTS.**

G.R. No. 47903. November 29, 1940

Ponente: LAUREL, J.

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LAUREL, J.:

In a petition bearing date of October 10, 1940, addressed to the Commission on Elections, Juan Sumulong, Esq., as president of "Pagkakaisa ng Bayan" (Popular Front Party), after setting forth at length the facts and circumstances upon which he bases his claim to minority representation on the boards of election inspectors in the impending general election for provincial and municipal officials, asks that the Commission "se sirva declarar que el partido Pagkakaisa ng Bayan, tambien conocido como el partido del Frente Popular, del que el que suscribe es actual presidente, tiene derecho a nominar al tercer inspector de eleccion y a su substituto en todas las localidades en que obtuvo el segundo lugar en numero de votos en las elecciones generales pasadas, asi como en aquellas localidades en que Pagkakaisa ng Bayan es la unica minoria politica nacional existente."

A supplementary petition was filed on October 17, 1940, to which certain documents were attached to support the contention that the petitioner, Juan Sumulong, and not Pedro Abad Santos, was the head of the Popular Front Party, and as such was the one entitled to make the proposal for the appointment of minority inspectors in the incoming election for provincial and municipal officials.

Upon what appears to be a conflicting claim to minority representation on the boards of election inspectors, the Commission, on October 17, 1940, rendered its ruling in the form of telegraphic instructions, laying down certain rules to be followed by the presiding officers of the municipal councils in the appointment of minority inspectors. The telegram is worded as follows:

Exhibit C

"TELEGRAM FOR TRANSMISSION

"MANILA, October 17, 1940

"This Commission considers it paramount that we decide immediately the question of representation of the opposition or so-called Popular Front Party in Boards Inspectors claimed by two different factions one headed by Juan Sumulong and the other by Pedro Abad Santos stop in view of lack of time to write a more elaborate opinion and because this Commission considers necessary the immediate promulgation of certain rules to settle election conflicts and their incidents in an expeditious manner we have laid down following rules for information and guidance of all presiding officers of councils in order that there may be uniformity in the appointment of election inspectors colon number one the Popular Front Party which was recognized by the Supreme Court in its several decisions (open, parenthesis Campomanes versus Municipal Council of Sariaya

Tayabas thirty-six Official Gazette page one four two nine semicolon Tria Tirona versus Municipal Council of Dagupan Pangasinan thirtysix Official Gazette page one one zero one semicolon Municipal Board of the City of Manila and Mendoza versus Agustin thirty six official Gazette page one three three five close parenthesis) was a confederation of several minority parties stop Each of said minority parties composing the confederation continued to enjoy its personality separate and distinct from the said Popular Front Party which was recognized by the Supreme Court stop Number two the personality of each minority party not having been lost comma The presiding officer of the council before making an appointment of election inspector to represent the Popular Front Party in the Board of Election Inspectors should make an investigation and decide whether the minority local party organized in his municipality is affiliated to the faction of the Popular Front Party headed by Juan Sumulong or to the faction of the Popular Front Party headed by Pedro Abad Santos and to recognize the nominations made by Sumulong or Abad Santos depending as to whether the minority local party in his municipality pertained to the Sumulong Faction or to the Abad Santos Faction stop Number three in the event that the local minority party has been divided into two groups comma one of which belongs to Sumulong Faction and the other to Abad Santos Faction then the group with more following shall be recognized and the corresponding representative of that faction shall have the right to propose the minority election inspector paragraph This Commission declines to decide as to which of the two factions of the so-called Popular Front Party comma one headed by Sumulong and the other by Pedro Abad Santos is entitled to use the name Popular Front Party because this question in the opinion of this Commission properly pertains to the courts of justice.

"PEDRO CONCEPCION

"Chairman

"Commission on Elections

"NOB. Free under sec. 20,

Comm. Act No. 357

"RODRIGO D. PEREZ, JR.

Secretary of the Commission"

On October 23, 1940, the petitioner, Juan Sumulong, moved for reconsideration of the foregoing ruling and instructions of the Commission, which motion for reconsideration was denied on November 4, 1940. In denying the motion for reconsideration, the Commission said:

"It is urged upon us that we decide the question of whether Hon. Juan Sumulong or Hon. Pedro Abad Santos is the real and true head of the Popular Front Party. On this respect this Commission reiterates its decision that the question is properly for the courts to decide.

"It is also urged upon this Commission that our aforesaid decision be amended to the effect that the provincial fiscal by virtue of his training, experience and knowledge of the law, be given the power to determine which of the two factions of the Popular Front Party, that headed by Sumulong or that headed by Abad Santos, is entitled to propose election inspectors of said party, to the end that alleged abuses committed by municipal mayors in connection with the appointment of election inspectors be curtailed. With due regard to the laudableness of the suggestion, it legitimately cannot be urged that the provincial fiscal be empowered by this Commission to conduct the investigation required of the presiding officer because that would be in contravention of law. As stated in our decision in question, in the event that the Popular Front Party did not present a united front in the election for provincial and municipal officials held in 1937 and is again divided during the forthcoming election, both factions thereof claiming the right to propose inspectors for the said party, the presiding officer of the municipal council concerned is enjoined to investigate the respective claims of the said two factions and grant inspectors to whichever faction had obtained more votes in the said election held in 1937 which constitute the next immediate place, and that if the Popular Front Party presented a solid front in the. election held in 1937 but is divided in the forthcoming election that faction which has more following in the municipality shall be given the third minority inspector. The authority to determine by a thorough investigation the merits of the respective claims of the factions of the Popular Front Party is

necessarily incident to the power of appointment vested by law in the presiding officer of the municipal council. To deprive the presiding officer of the authority to inquire into the facts and circumstances necessary to render his power of appointment rational in such specific cases would, in effect, abridge the power of appointment vested in him by the law. The argument that the power to investigate as to which faction is entitled to the Popular Front inspectors might be abused by the presiding officer of the council is no argument against the existence of the power. Every authority, however indispensable, may be subject to abuse.

"However, if one of the factions of the Popular Front Party is not satisfied with the decision of the presiding officer of the municipal council, he may appeal to this Commission, which, according to section 2 of Commonwealth Act No. 607, possesses the power to reverse the decision of the presiding officer and order him to comply with the law.

"In view of all the foregoing, this Commission decides to deny the aforementioned petition of Hon. Juan Sumulong.

"Let the Secretary of this Commission furnish copies of this decision to Hon. Juan Sumulong and to all Provincial and City Fiscals, for their information and guidance."

The petitioner now asks that we review the aforesaid ruling of the Commission on Elections in accordance with section 2 of Commonwealth Act No. 607, approved August 22, 1940. The rules of this court do not prescribe the procedure to be followed in the review of cases elevated to it from the Commission on Elections, in view of the fact that said Rules were approved before the enactment (August 22, 1940) of Commonwealth Act No. 607, creating the Commission on Elections and authorizing the review of its decisions, orders and rulings by the Supreme Court. Proceeding by analogy and in view of the urgent nature of the case, the respondents were required to forthwith answer the petition for review, setting the case at the same time for oral argument on the 28th of this month of November.

Petitioner enumerates the reasons for the allowance of his petition for review, and contends that the Commission on Elections has erred:

"(a) In holding that it has no jurisdiction to decide whether the petitioner or Pedro Abad Santos is the real head of Pagkakaisa ng Eyan.

"(b) In not holding that its power to decide whether petitioner or Pedro Abad Santos is the real head of VOLUME 70. 709 Pagkakaisa ng Bayan is necessarily incident to its express power to decide on the appointment of election inspectors, including the appointment of the minority inspectors;

"(c) In not holding that the duty of the municipal mayors to appoint election inspectors proposed by the directorates of the majority and minority parties is purely ministerial, and that in case of conflicting claims to the third inspector as happened in the instant case the matter must be investigated and decided by the Commission on Elections and not by the municipal mayors ;

"(d) In not declaring that by his own admissions appearing in documents whose authenticity have not been denied, Pedro Abad Santos was merely the representative of Pagkakaisa ng Bayan for the province of Pampanga in the past elections;

"(e) In not declaring that by his own acts and declarations, the party now headed by Pedro Abad Santos is the 'Communist Party of the Philippines, affiliated to the Communist International';

"(f) In not declaring the petitioner to be the real head of 'Pagkakaisa ng Bayan';

"(g) In not declaring that the alleged expulsion of the petitioner from Pagkakaisa ng Bayan was the act of irresponsible and unscrupulous Communists who falsely represented the late Monsignor Gregorio Aglipay, Geronimo Santiago and Vicente Cruz to be members of their directorate so as to give semblance of legality to

their claim that their convention at the Retono Building was the convention of Pagkakaisa ng Bayan; and

"(h) In not instructing the municipal mayors that Pagkakaisa ng Bayan under the presidency of the petitioner is the party entitled to nominate the third inspector and his substitute." (Petition for Review, par. VIII, pp. 9-10.)

The prayer of the petitioner is that this Court "require the respondent Commission on Elections to certify forthwith the record of all the proceedings had in the above matter, so that the same may be considered; that upon such hearing and consideration the decisions of the said Commission of October 17 and November 4, 1940, be held to be erroneous, and that another order superseding the same be entered, declaring Tagkakaisa ng Bayan' under the presidency of the petitioner to be the party entitled to nominate the third inspector and his substitute." (Petition for Review, p. 15.)

On November 25, 1940, respondent Abad Santos, by his counsel, filed his answer to the petition for review of the petitioner, and gives the reasons why the claim of the petitioner should be rejected. These reasons are as follows:

"1. There is no legitimate organized political party known as Frente Popular or Pagkakaisa ng Bayan, except the one headed by respondent Pedro Abad Santos, petitioner's claims to the contrary notwithstanding;

"2. At most, petitioner's organization which he and those who commune with him pretend to call Frente Popular, is nothing but a spurious organization totally devoid of the ideology and basis principles which gave birth to the popular front movement as that political conception is known today all over the civilized world. Popular Front parties are, and have always been, initiated, organized and directed by communists, socialists and other progressive liberals and radicals, and never by the reactionary conservative elements of the bourgeoisie. These parties, by the nature of their organization, recognize no individual leadership or responsibility in the control and direction of their affairs or aims, such power being vested always upon an executive committee composed of duly appointed representatives from the different political units and entities under the confederation or front. Collective leadership is, therefore, the front's slogan, and never individual leadership, such as the petitioner desire to assume when, after the organization of the original Pagkakaisa ng Bayan, he came within the fold as Chairman of its Advisory Council, which was a mere creation of the National Executive Committee. At most, the Advisory Council of the Frente Popular was an extra-legal body whose functions, by common consent, were to give advice or counsel on questions of national or international import, which advice or counsel may or may not be heeded by the supreme organ, the National Executive Committee of the Front. The central idea behind this system is to check dictatorial tendencies of any given individual in the front, and democratization of delegated powers among the different duly elected members of the governing council, the executive committee, which acts as a single directing organ or body. Enclosed herewith is the printed original tract, known as Pact or Constitution of the Frente Popular, containing the frame-work or composition of its governing body, its fundamental aims and purposes, and the manner how such aims and purposes are to be carried out and pursued.

"3. That the political tract or Pact mentioned in the preceding paragraph was conceived, written, and agreed upon by a committee duly elected by the original signers thereto, of which committee, your respondent Pedro Abad Santos was the chairman. Petitioner Juan Sumulong was only a member of this committee of the Frente Popular.

"4. It is admitted that respondent Pedro Abad Santos is the founder and President of the Socialist Party in Pampanga, vice-President of the Communist Party of the Philippines (merger of the Socialist Party of Pampanga and the Communist Party of the Philippines, of which Crisanto Evangelista is its President), and National Chairman of the Frente Popular, duly elected by a convention duly held on October 8, 1939, at the El Retono Building, Manila, on which occasion, the petitioner Juan Sumulong, as well as Geronimo Santiago, representing the Parti do Socialista Nacional, by unanimous vote, was expelled from the Frente Popular;

"5. It is denied that the Frente Popular, of which respondent Pedro Abad Santos, is its present National

Chairman, is the same as the 'Communist Party of the Philippines, affiliated to the Communist International.'

The fact is the Communist Party of the Philippines, which is affiliated to the Communist International, as an organized political party with a platform and constitution distinct and separate from the Pact or Constitution of the original Frente Popular, is an affiliate to the Frente Popular or Pagkakaisa ng Bayan now headed by Pedro Abad Santos. In the beginning of the organization of the Frente Popular, the Communist Party of the Philippines, headed by Crisanto Evangelista, was not a member thereof, but the Radical Socialist in Pampanga, afterwards known as the Socialist Party of Pampanga, was a member thereof. Please see pages 1 and 2 of the letter of respondent Pedro Abad Santos to the Electoral Commission dated October 10, 1940. The Communist Party of the Philippines officially became a member of the Frente Popular just shortly before the Convention held on October 8, 1939, which expelled Juan Sumulong and Geronimo Santiago from the folds of the Frente Popular;

"5. The present Frente Popular, which is the same Frente Popular organized on September 20, 1936, now headed by Pedro Abad Santos, is composed of the same political parties and labor and civic bodies that originally affiliated with the Frente Popular on September 20, 1936, with the exception of the 'Lapi' headed by Miguel Cornejo, which became inactive and was considered to have automatically withdrawn from the Frente Popular, and of the Partido Socialista Nacional, nominally headed by Geronimo Santiago, which was considered to have also withdrawn from the Pagkakaisa ng Bayan, with the expulsion of Geronimo Santiago therefrom. The loss of the Lapi and Partido Socialista Nacional was compensated by the admission of the Communist Party of the Philippines, since which time, with the adoption of a new platform or constitution differing slightly from the original Pact or Constitution of the Frente Popular organized on September 20, 1936, this political organization or Pagkakaisa ng Bayan remains intact to the present both in composition of its membership, ideologies, political direction and control of its internal affairs, as well as the make-up of its controlling organs or bodies." and for these reasons prays, among other things, "that the right to nominate minority inspectors be exclusively granted to the Frente Popular headed by your respondent herein Pedro Abad Santos, because it is the Frente Popular that obtained the second highest total number of votes in the general elections of 1937, when there existed neither Sumulong nor Abad Santos faction of the same, then;" (prayer of the Respondent, par. (b), p. 5.)

The respondent Commission field neither an answer nor any explanation for not filing one. This is either an indication of lack of interest in supporting the legal position it has taken in connection with the issuance of the instructions aforesaid, or because, in its opinion, it is unnecessary to do one or the other.

It does not seem necessary to take up seriatim the errors assigned by the petitioner, for the reason that, in our opinion, the legal questions raised may be reduced to two principal propositions: (1) whether or not the respondent Commission is empowered to issue the instructions hereinabove quoted; and (2) whether or not the instructions thus issued are in accordance with law.

With reference to the first proposition, we observe that the Commission on Elections is a legislative creation and its organic act (Commonwealth Act No. 607, approved August 22, 1940) is virtually a reproduction of Article III of Resolution No. 73 of the National Assembly, adopted April 11, 1940, proposing an amendment to the Philippine Constitution, by establishing an independent Commission on Elections. Under section 2 of this Act "the Commission on Elections shall have exclusive charge of the enforcement and administration of all laws relative to the conduct of elections," and "shall decide, save those involving the right to vote, all administrative questions affecting elections, including the determination of the number and location of polling places, and the appointment of election inspectors and of other election officials." The constitution of the boards of election inspectors and the appointment of the members thereof are governed by section 6 of Act No. 357 of the National Assembly. Section 69 thereof imposes upon the presiding officer of the municipal council the duty to appoint "fifty days immediately prior to the date of a regular election, a board of election inspectors composed of three

inspectors and a poll clerk who shall hold office until their successors are appointed for the next regular election, Unless they are sooner relieved." Adopting the system of bi-partisan representation on the boards, section 70 provides that "two of the inspectors and the poll clerk and their substitutes shall belong to the party which polled the largest number of votes at the next preceding election, and the other inspector and his substitute shall belong to the party which polled the next largest number of votes at said election," and in accordance with section 73, "the inspectors and poll clerks and their respective substitutes shall be from among those proposed by the authorized representatives of the national directorates of the parties," imposing upon said parties the obligation to communicate in writing to the presiding officer of the municipal council at least three days before the day fixed for the appointment of the board of election inspectors, the names and addresses of all persons who shall act as their representatives in connection with the appointment of the members of the board of inspectors. Section 71 prescribes the method to be followed in case two major political parties unite, and section 72 denies the right of representation "to any branch or fraction which has seceded from its respective party, or from the party resulting from their fusion."

It is apparent from these divers provisions of the Election Code that it is, inter alia, the mandatory duty of the presiding officer of the municipal council to appoint an inspector of election to represent the minority party and that this appointment shall be made from amongst those proposed by the authorized representatives of the national directorate of such party. If this is not done, the matter may be submitted to the Commission, or the Commission may, on its own initiative, direct compliance with the mandate of the law. To avoid having to decide each case as it comes up separately, the Commission may issue general instructions, conformably with law, on the matter of the appointment of election inspectors for the guidance of all concerned. This is the case here. As there can be no election without election inspectors (*Municipal Council of the City of Manila vs. Agustin*, G. R. No. 45844, November 29, 1937, XXXVI Off. Gaz. 1335) and as the constitution of the boards of election inspectors and the appointment of the members thereof are matters that go to the root of clean and honest elections, the Commission on Elections in virtue of its authority to enforce and administer all laws relative to the conduct of elections, is undoubtedly empowered to issue, for the guidance and compliance of all concerned, such instructions as are properly intended to carry into effect the requirements of the law. Without deciding at this time the question of whether the powers conferred upon the Commission are more extensive than those exercised by the Department of the Interior before the enactment of Act No. 607, there was, in our opinion, at least, a complete transference of the power of direct supervision heretofore exercised by the Department of the Interior over all provincial, municipal and city officials, in the performance of their duties relative to the conduct of elections and the enforcement of the Election Law. We are, therefore, clearly of the opinion that the respondent Commission has the legal authority to issue instructions conformably with law pertaining to the appointment of election inspectors, with a view to the effectuation and due enforcement of the laws enacted on the subject by the National Assembly.

Upon the second proposition, namely, whether or not the instructions issued by the Commission on Elections are in accordance with law, it should be observed that such instructions are divided into four main parts now to be referred to.

The first part refers to the confederated character of the Popular Front Party, according to the various decisions of this court. This point, however, is unimportant, and any inference drawn therefrom is also unimportant for the purposes of this decision.

The second part lays down the general rule that the minority inspectors should be accorded to the Sumulong faction or the Abad Santos faction in a given locality "depending as to whether the minority local party in his municipality pertain to the Sumulong faction or to the Abad Santos faction." This is not believed to be in harmony with the policy and mandate of the law. Minority representation is given to the party "which polled the next

largest number of votes at the immediately preceding election." If the Popular Front Party is the party that obtained this number of votes, it is entitled to minority representation in the locality. It becomes also necessary to ascertain who are its authorized representatives or its chosen spokesman for the purpose of the application of section 73 of the Election Code with reference to the proposal of election inspectors and poll clerks. In case of secession of a branch or faction from an organized party, representation is denied to the seceding branch or faction.

The third part of the instructions requires that "in the event that the local minority party has been divided into two groups, one of which belongs to the Sumulong faction and the other to the Abad Santos faction, then the group with more following shall be recognized and the corresponding representative of that faction shall have the right to propose the minority election inspectors." This instruction is contrary to law. It recognizes the right of groups to political representation on the electoral boards, contrary to the policy of the law to deny recognition for this purpose to such groups in the presence of a duly organized political party in a locality. In the case of *Campomanes vs. The Municipal Council of Sariaya, Tayabas*, G. R. No. 45869, promulgated December 8, 1937, XXVI Off. Gaz., 1430, we said:

"Section 417 of the Election Law, prior to its amendment by Commonwealth Act No. 233, recognizes the legal personality of political aggroupments for election purposes, and the right to propose inspectors of election. A 'political group' is there denned. The amendatory section of Commonwealth Act No. 233 no longer accords this recognition and has eliminated the definition of this term. The evident purpose of the law is to foster and encourage the formation of political parties inspired by high political ideals of government. In case, therefore, of antagonism or conflict between a political party whose claim to national character is not denied and a mere political group, the claim of the former, as an opposition party, to an inspector of election under section 417 of the Election Law, as amended, must prevail over that of the latter. That such is the intention of the legislature is, furthermore, inferable from paragraph (f) of the same section."

A party may have but small following, but if it has the legal standing of a "party" under section 76 of the Election Code, it may properly claim representation on the boards of election inspectors as against a political group. The basis of majority and minority representation on the boards of election inspectors iaf under section 70 of the Election Code, the number of votes received at the next preceding election, to be determined in the manner therein prescribed. As stated, if the Popular Front Party was the party that obtained the "next largest number of votes at said election" in a given municipality, this party and no other, is entitled to minority representation. This is true even if the Popular Front Party were considered as a mere confederation or alliance of other minority parties or groups. A party allied or temporarily consolidated with other parties may be such a "party", in contemplation of section 76 of the Election Code, but if it came out as part and held itself under the banner of the resulting confederation, it is not entitled to minority representation under the law. This is because the votes received were accorded by the people to the aggroupment formed, consequent upon the entente cordiale or *modus vivendi*, and no succession to any political right is in order in concurrence with what still is an existing confederation.

Although the fourth part of the instructions refers to the question of "as to which of the two factions of the so-called Popular Front Party, one headed by Sumulong and the other headed by Abad Santos, is entitled to use the name Popular Front Party/"—a matter which, in the opinion of the Commission on Elections, "pertains to the courts of justice"—the pleadings and the records disclose that the real question is as to who, upon the evidence presented, is the duly chosen and authorized head of the Popular Front Party and as such head is entitled to represent the directorate in the matter of the appointment of the third inspector of election to which the minority party is entitled under the law. The determination of this question of fact is necessarily involved in the appointment required to be made of the inspectors of election for the minority party. The appointing power must so ascertain, subject to the supervisory and reviewing authority of the Commission on Elections. For uniformity of

action and in view of the urgency of the situation, this matter may now be speedily determined by the Commission in the public interest.

Specifically and categorically stated, the right to minority representation on the board of election inspectors is tested by the following rules and is subject to the following conditions: (1) The political organization in whose behalf the claim is made must be a political party in the sense that it is "an organized group of persons pursuing the same political ideals in a government" (Sec. 76, Commonwealth Act No. 357.) This is a question of fact, or a mixed question of fact and law. (2) The political party must have taken part at the immediately preceding election and obtained the next largest number of votes at said election (Sec. 70, Ibid.)

In concurrence with a "political group" in the locality, the political party is entitled to preferential recognition, if it had taken part in the immediately preceding election and had received votes and the claim of the party to representation is made in good faith. (3) The inspectors of election must be proposed by the authorized representatives of the national directorates of the parties (Sec. 73, Ibid.). Who constitute the party directorate and who are its authorized representatives for this purpose involve an ascertainment of fact which must be made by the appointing power, subject to the supervisory and reviewing authority of the Commission on Elections (Sec. 2 of Commonwealth Act No. 607.).

Insofar as the instructions issued by the respondent Commission on Elections are not in accordance with this decision and the rules herein specifically formulated, the same are hereby reversed. The case will accordingly be remanded to that body for appropriate action, and if and when necessary, for determination of such facts as have to be ascertained for the proper application of the law and the rules herein given, without pronouncement regarding costs. So ordered.

Avanceña, C.J., Imperial, Diaz, and Horrilleno, JJ., concur.

Instructions reversed, and cause remanded for appropriate action.

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